

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>09-357</u>
v.	:	DATE FILED: <u>05/26/09</u>
JERMAINE PRYOR	:	VIOLATIONS:
JONNIE MAE WRIGHT	:	21 U.S.C. § 846 (conspiracy to distribute
ROBERT FIELDS	:	cocaine base ("crack") - 1 count)
	:	21 U.S.C. § 841(a)(1), (b)(1)(D)
	:	(distribution of marijuana - 1 count)
	:	21 U.S.C. § 841(a)(1), (b)(1)(C)
	:	(distribution of cocaine base ("crack") - 5
	:	counts)
	:	21 U.S.C. § 841(a)(1), (b)(1)(C)
	:	(possession with intent to distribute
	:	cocaine base ("crack") - 1 count)
	:	18 U.S.C. § 924(c)(1) (possession of a
	:	firearm in furtherance of a drug
	:	trafficking crime - 1 count)
	:	18 U.S.C. § 922(g)(1) (possession of a
	:	firearm by a convicted felon - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least on or about February 19, 2008, through on or about March 12, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JERMAINE PRYOR,
JONNIE MAE WRIGHT, and
ROBERT FIELDS**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine base

(“crack”), a Schedule II controlled substance, in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C) .

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants JERMAINE PRYOR, JONNIE MAE WRIGHT, and ROBERT FIELDS agreed to distribute cocaine base (“crack”) in Philadelphia, Pennsylvania.

3. Defendants JERMAINE PRYOR, JONNIE MAE WRIGHT, and ROBERT FIELDS sold a total of approximately 4 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”) to an undercover police officer.

4. Defendants JERMAINE PRYOR, JONNIE MAE WRIGHT, and ROBERT FIELDS utilized 1320 Farson Street in Philadelphia as the address from which they sold narcotics.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants JERMAINE PRYOR, JONNIE MAE WRIGHT, and ROBERT FIELDS committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about February 19, 2008:

1. Defendant JONNIE MAE WRIGHT, after answering the door at 1320 Farson Street in Philadelphia and receiving an order for marijuana from an undercover police officer known to the grand jury (“the officer”), went into the house and sold two jars containing 2.41 grams of marijuana to the officer in exchange for \$40.

On or about February 26, 2008:

2. Defendant JONNIE MAE WRIGHT, after answering the door at 1320 Farson Street in Philadelphia, invited the officer inside and told the officer she had marijuana and cocaine base (“crack”). Defendant WRIGHT sold the officer two green packets containing 284 milligrams of cocaine base (“crack”) and was paid \$40 in cash.

On or about February 27, 2008:

3. Defendant JONNIE MAE WRIGHT, after answering the door at 1320 Farson Street in Philadelphia, invited the officer inside and agreed to sell the officer \$40 worth of cocaine base (“crack”). The officer gave the money to defendant WRIGHT.

4. Defendant JONNIE MAE WRIGHT knocked on the second floor front bedroom door of 1320 Farson Street, which was answered by defendant JERMAINE PRYOR. Defendant WRIGHT gave \$40 to defendant PRYOR, and defendant PRYOR gave two green packets containing 229 milligrams of cocaine base (“crack”) to defendant WRIGHT, who in turn gave the cocaine base (“crack”) to the officer.

On or about March 4, 2008:

5. Defendant JONNIE MAE WRIGHT answered the door of 1320 Farson Street and admitted the officer into the residence.

6. Defendant JERMAINE PRYOR sold seven orange packets containing 414 milligrams of cocaine base (“crack”) to the officer and was paid \$20 in cash.

On or about March 11, 2008:

7. Defendant JONNIE MAE WRIGHT answered the door of 1320 Farson Street and admitted the officer into the residence.

8. Defendant JERMAINE PRYOR sold 522 milligrams of cocaine base (“crack”) to the officer and was paid \$80 in cash.

On or about March 12, 2008:

9. Defendant JONNIE MAE WRIGHT answered the door of 1320 Farson Street and admitted the officer into the residence.

10. Defendant ROBERT FIELDS sold 28 packets (22 clear and six yellow) containing 2.460 grams of cocaine base (“crack”) to the officer and was paid \$300 in cash.

11. While inside a bedroom on the second floor of 1320 Farson Street, defendant JERMAINE PRYOR possessed for distribution two clear packets containing 83 milligrams of cocaine base (“crack”), a scale, a plate with cocaine residue, \$1,360 in cash, a small box of ammunition, and a Taurus Millennium 9mm pistol, serial number TZ194801, loaded with twelve rounds of ammunition.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 19, 2009, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

JONNIE MAE WRIGHT

knowingly and intentionally distributed a mixture and substance containing a detectable amount of
marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 26, 2008, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

JONNIE MAE WRIGHT

knowingly and intentionally distributed a mixture and substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 27, 2008, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**JERMAINE PRYOR and
JONNIE MAE WRIGHT**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and
substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title
18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 4, 2008, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**JERMAINE PRYOR and
JONNIE MAE WRIGHT**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and
substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title
18, United States Code, Section 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 11, 2008, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**JERMAINE PRYOR and
JONNIE MAE WRIGHT**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and
substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title
18, United States Code, Section 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 12, 2008, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**JONNIE MAE WRIGHT and
ROBERT FIELDS**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and
substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title
18, United States Code, Section 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 12, 2008, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

JERMAINE PRYOR

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 12, 2008, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

JERMAINE PRYOR

knowingly possessed a firearm, that is, a Taurus Millennium 9mm pistol, serial number TZ194801,
loaded with 12 live rounds of ammunition, in furtherance of a drug trafficking crime for which he
may be prosecuted in a court of the United States, that is, conspiracy to distribute cocaine base
("crack") and possession with intent to distribute cocaine base ("crack"), in violation of Title 21,
United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 12, 2008, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

JERMAINE PRYOR,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Taurus Millennium 9mm pistol, serial number TZI94801, loaded with 12 live rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(g)(1) and 924(c)(1), as set forth in this indictment, defendant

JERMAINE PRYOR

shall forfeit to the United States of America the firearm and ammunition involved in the commission of these offenses, including, but not limited to:

1. Taurus Millennium 9mm pistol, serial number TZI94801, and 12 live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

MICHAEL L. LEVY
United States Attorney